



MEMO ENDORSED.

MURIEL GOODE-TRUFANT
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

ELISSA JACOBS
Senior Counsel
Phone: (212) 356-3540
Fax: (212) 356-3509
Email: ejacobs@law.nyc.gov

January 21, 2025

BY ECF

Honorable Ona T. Wang
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Application **GRANTED**. The conference currently scheduled for January 28 is **ADJOURNED to March 5, 2025, at 10:00 a.m.**

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Ona T. Wang".

Re: Ferera v. City of New York et al.
24-CV-3911 (AT) (OTW)

Ona T. Wang
U.S.M.J.

Jan. 22, 2025

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and the attorney for Defendant City of New York, in the above-referenced case.¹ I write on behalf of Defendant City to respectfully request that the Court adjourn the Status Conference currently scheduled for January 28, 2025, at 12:00 pm. This is Defendants' first request for an adjournment. Plaintiff consents to the instant request.

By way of background, Plaintiff filed the complaint on May 21, 2024. *See* ECF No. 1. Plaintiff alleges that he was improperly arrested due to a false allegation that he had assaulted a hair stylist and that in the process of his arrest, NYPD officers used excessive force when they pointed a gun at Plaintiff. Plaintiff also alleges an Equal Protection violation related to the pointing of the gun at him. *See* ECF No. 9. On December 12, 2024, a status conference was scheduled for January 28, 2025. *See* ECF No. 42. On January 3, 2025, Plaintiff filed a Motion for Partial Summary Judgment. *See* ECF No. 43, 44. Also on January 3, 2025, Defendants filed a Motion to Dismiss. *See* ECF 48. The responses and replies to the pending motion are due January 31, 2025 and February 14, 2025, respectively.

¹ This case has been assigned to Assistant Corporation Counsel Jessica Ochoa. Ms. Ochoa is a member in good standing with the New York State Bar (No. 6124655) as well as admitted to practice before the U.S. District Courts of the District of Columbia (No. 1736588) and Maryland (No. 30564). She is currently in the process of being admitted to practice before the present court. Ms. Ochoa may be reached directly at (212) 356-3159.

At this time, Defendant respectfully requests an adjournment of the Status Conference as undersigned counsel, will be out of the office from January 21, 2025, through January 28, 2025. Accordingly, Defendants request the Status Conference be rescheduled to another date convenient to the Court.

Defendants thank the Court for its time and consideration of this request.

Respectfully submitted,

/s/ Elissa Jacobs
Elissa Jacobs
Senior Counsel
Special Federal Litigation Division

cc: **BY ECF**
Joshua Pepper, Esq.
Counsel for Plaintiff